

UNITED STATES DISTRICT COURT OF THE  
SOUTHERN DISTRICT OF NEW YORK

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ASHOOK RAMSARAN,

Index No.: 1:15-cv-10182

Plaintiff,

-against-

**NOTICE OF MOTION TO  
DISMISS PLAINTIFF'S  
COMPLAINT**

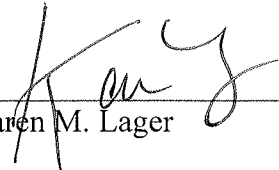
THOMAS ABRAHAM, SUNNY KULATHAKAL,  
RAM GADHAVI, APN NEWS, TEHELKA NEWS,  
AND DNA NEWS,

Defendant.  
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**PLEASE TAKE NOTICE**, that upon the pleadings served in this action, the herein Notice of Motion, dated June 24, 2016, the accompanying Memorandum of Law dated June 24, 2016, and upon all prior pleadings and proceedings had herein, the Defendant, **RAM GADHAVI** ("moving Defendant"), will move this court, before the Honorable Paul Oetken, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, as soon as counsel may be heard, for an Order: (i) pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for dismissal of the Plaintiff's Complaint as against the moving Defendant; and (ii) for such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to Rule 6 of the Federal Rules of Civil Procedure, and Rules 6.1 and 6.4 of the Local Rules of the United States Court for the Southern District of New York, any opposing affidavits and answering memoranda shall be served upon the undersigned no later than July 8, 2016.

Dated: New York, New York  
June 24, 2016

  
\_\_\_\_\_  
Karen M. Lager

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